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PART OF LATE FILED

October 21, 2002

Kevin J. Martin  
Commissioner  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Ex parte contact in CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200 and 95-116; Universal Service Contribution Reform

Dear Commissioner Martin:

The American Hotel & Lodging Association (AH&LA) is a federation of state and local lodging associations, representing this nation's hotel and lodging industry. Over 53,000 lodging properties with more than 4.2 million rooms and over 1.9 million employees exist in the United States. Our industry's annual sales exceed \$103 billion and our yearly payroll exceeds \$20 billion. AH&LA's membership ranges from the smallest independent properties to the largest convention hotels.

AH&LA is pleased that the Commission is considering new methods for funding universal service. The current approach, which assesses contribution obligations based on interstate and international revenues, is uneconomic and therefore unsustainable, and should be replaced with a method that assesses contribution obligation based on lines and activated wireless numbers. AH&LA, however, strongly objects to a recent proposal made by certain state regulators to freeze the assessments attributable to residential lines.

Lodging operators pay a federal universal service surcharge of between 8% and 10.6%. This revenue-based percentage charge requires high-volume users to pay a disproportionate amount of universal service costs. As a result, the current system discourages use of productivity-enhancing communications technologies and creates a strong financial incentive for high-volume customers to use alternative technologies and service packages to reduce their costs – not a good result as our country fights its way out of recession.

The Commission should replace the current revenue-based universal service surcharge with a more equitable charge that would apply to every customer's connection to the network – to residential and business lines on

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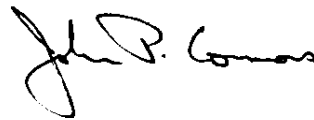


wireline networks and activated telephone numbers on wireless networks. The Commission has requested comment on a universal service funding plan that includes such line and number charges, proposed by a coalition consisting of The Ad Hoc Telecommunications Users Committee, AT&T, e-TUG, and WorldCom. Under this proposal, increases and decreases in universal service subsidies would be reflected in uniform percentage adjustments to all per line and wireless number charges. AH&LA urges you to adopt this connection-based proposal.

AH&LA also strongly objects to a recently filed proposal by certain state regulators that would freeze for five years the line and activated wireless number charges applied to residential and single line business customers. This proposal advances no legitimate public interest objective. Indeed, there is not a shred of evidence that proportionate increases in all line and number USF charges, if needed, would adversely affect residential telephone subscription levels or unfairly burden residential telephone service customers. The state regulators would subject business users alone to added subsidy burdens, burdens that could be quite substantial and that could undermine historic support for universal service subsidies.

We appreciate your consideration of our views.

Very truly yours,

A handwritten signature in black ink, appearing to read "John P. Connors". The signature is fluid and cursive, with the first name "John" being more prominent.

John P Connors